

EXHIBIT B

IN THE STATE COURT OF CHATHAM COUNTY
STATE OF GEORGIA

LYNN TOWNSEND, Individually
and as Executrix Of the Estate
of ROBERT P. TOWNSEND,

Plaintiff

v.

ARON G. WEINER, as Administrator
of the Estate of SANDRA DELORES
BUNTON and LAWRENCE BUNTON,

Defendants.

CIVIL ACTION NO. STCV09-00275

PLAINTIFF'S COMPLAINT

COMES NOW LYNN TOWNSEND, Individually and as Executrix of the Estate of ROBERT P. TOWNSEND, and states her Complaint against the Defendants, and shows the Court the following:

1.

The Defendant ARON G. WEINER, in his capacity as Administrator of the Estate of SANDY DELORES BUNTON, is a resident of Chatham County, Georgia and can be served with a copy of this Summons and Complaint at Weiner Shearouse, Weitz, Greenberg & Shawe, 14 East State Street, Savannah, Georgia 31401.

2.

The Co-defendant and joint-tortfeasor LAWRENCE BUNTON is a resident of Liberty County, Georgia and can be served with a copy of this Summons and Complaint at 358 Pine Avenue, Midway, Georgia 31320.

3.

Venue and jurisdiction are appropriate in this court.

4.

The Plaintiff LYNN TOWNSEND is a resident of Chatham County, Georgia.

5.

The Plaintiff is the widow of the decedent ROBERT P. TOWNSEND and has been appointed Executrix of his estate by the Probate Court of Chatham County, Georgia and she brings this action in her own individual capacity and in her representative capacity as Executrix of the Estate of ROBERT P. TOWNSEND.

6.

The Plaintiff and the decedent ROBERT P. TOWNSEND were married in Lawrence, Massachusetts on June 15, 1980. They raised two children: Lauren Townsend and Robert L. Townsend. Their daughter graduated from college and is gainfully employed. Their son was a junior attending Penn State University. This marriage was the only marriage for the plaintiff and the decedent. Mr. Townsend was employed by SABIC Innovative Plastics, USA, LLC as a plastics engineer. His annual income exceeded \$100,000.00 per year and he had additional benefits of employment including a retirement plan. Hancock Day School employed the Plaintiff as an elementary schooled teacher.

7.

On or about May 31, 2008, the decedent ROBERT P. TOWNSEND and the Plaintiff herein LYNN TOWNSEND were occupying a 2008 Chevrolet Impala automobile proceeding towards Love's Seafood Restaurant. They were traveling

on Highway 17 and were approaching the intersection of Silk Hope Road and Highway 17 in Chatham County, Georgia. The decedent, ROBERT P. TOWNSEND was driving and the Plaintiff was in the front passenger seat.

8.

Contemporaneously therewith, the decedent SANDRA DELORES BUNTON was traveling north on Highway 17 approaching the intersection of Silk Hope Road.

9.

Shortly before this time, the decedent SANDRA DELORES BUNTON had ingested large quantities of cocaine. Upon information and believe the plaintiff alleges that the decedent, Sandra Delores Bunton had withdrawn \$2,000.00 from the co-defendant's (her husband's) checking account that morning and used the \$2,000.00 to purchase crack cocaine and ingested the same just shortly prior to the incident complained of this Complaint.

10.

Just as the Plaintiff and her husband were entering the intersection of Silk Hope Road and Highway 17, the decedent SANDRA DELORES BUNTON, in her extremely intoxicated condition, caused her automobile to turn directly into the path of Plaintiff's automobile.

11.

Decedent ROBERT P. TOWNSEND attempted to stop but was unable to avoid the collision. As a result, a violent collision occurred between the vehicle occupied by the Plaintiff and that occupied by the decedent SANDRA DELORES

BUNTON. Robert Townsend was killed as result of the collision as was the decedent SANDRA DELORES BUNTON.

12.

Plaintiff LYNN TOWNSEND suffered significant injuries, was transported to the hospital where she received medical care for a period of time.

13.

The Plaintiff LYNN TOWNSEND sustained injuries as a result of the accident and incurred significant medical bills, disabilities, injuries and pain and suffering. She also suffered the severe emotional distress caused by her experiencing the traumatic event in which her husband of many years was killed in the incident

14.

At all times pertinent hereto, the Defendant LAWRENCE BUNTON knew or should have known that his wife and the decedent SANDRA DELORES BUNTON was not safe driver due to her use of controlled substances while driving, including but not limited to, cocaine and crack cocaine. Despite this knowledge, he allowed and/or encouraged the decedent SANDRA DELORES BUNTON to use the automobile in question which was owned by him for purposes of driving to obtain quantities of controlled substances, including but not limited to, cocaine and crack cocaine.

15.

The Defendant LAWRENCE BUNTON knew or should have known that such activity caused her to be an unsafe driver, putting other motorists on the highway at risk.

16.

The actions of the Defendant LAWRENCE BUNTON show malice, fraud, wantonness and oppression, willful misconduct, an entire want of care that raises a presumption of conscious indifference to the consequences of his actions, and accordingly the Plaintiff is entitled to an award of punitive damages against the Defendant LAWRENCE BUNTON.

17.

The economic value of the life of the decedent ROBERT P. TOWNSEND well exceeds \$2,000,000.00 and approaches \$3,000,000.00.

18.

All the damages suffered by the Plaintiff individually and in her representative capacity were proximately caused by the joint negligence and gross negligence of the defendants and the plaintiff was wholly without fault in regard to the same.

WHEREFORE, Plaintiff prays for judgment against the Defendant ARON G. WEINER as Administrator of the Estate of SANDRA DELORES BUNTON in amounts to compensate her for the value of her husband's life, for the emotional distress experienced by her as a result of experiencing her husband's violent death, the loss of her relationship with her husband and for her own personal injuries, disabilities, pain and suffering and medical bills.

As to the Defendant LAWRENCE BUNTON, the Plaintiff prays for judgment against him for the value of her husband's life, loss of her relationship with her husband, for the emotional distress experienced by her as a result of

experiencing her husband's violent death, pain and suffering, disabilities,
personal injuries medical bills and punitive damages.

Respectfully submitted this 19 day of January, 2009.

DUFFY & FEEMSTER



DWIGHT V. FEEMSTER

State Bar No. 257253

Attorney for Plaintiff

P. O. Box 10144
Savannah, GA 31412
(912) 236-6311